



Department of Energy
Idaho Operations Office
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Nicholas Ceto, INEEL Project Manager
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Richland, WA 99352

Daryl F. Koch, Acting Remediation Manager
Waste Management and Remediation Division
Idaho Department of Environmental Quality
1410 North Hilton
Boise, Idaho 83706-1255

SUBJECT: Request for Concurrence on the Approach for Applying Land Disposal Restriction Treatment Standards for TSF-09/18 V-Tanks Contents at Test Area North, Waste Area Group 1, Operable Unit 1-10 (EM-ER-04-176)

Dear Mr. Ceto and Mr. Koch:

This letter requests the concurrence of the CERCLA Remediation Program Managers on the approach for applying Land Disposal Restriction treatment standards as applicable or relevant and appropriate requirements (ARARs) for the treatment of TSF-09/18 (V-Tanks) contents. Because of the significant involvement of the DEQ's hazardous waste program organization in this remediation, we request that the DEQ CERCLA Remediation Program Manager document its coordination with that organization in DEQ's concurrence. The proposed approach is based upon the V-Tanks contents waste being subject to F001 listed waste treatment standard for tetrachloroethylene and trichloroethylene, but not the characteristic treatment standards for those same constituents. This approach is based upon 40 CFR 268.9(b). This approach was discussed and informal concurrence was obtained from the agency WAG Managers during the Operable Unit (OU) 1-10 agency call on August 5, 2004.

The V-Tanks contents have been declared to be an F001 listed waste. Due to the solids content, the waste is a non-wastewater. The OU 1-10 ROD Amendment requires that the V-Tanks waste be treated to meet the non-wastewater F001 concentration-based treatment standard for all of the F001 constituents including trichloroethylene; tetrachloroethylene; methylene chloride; 1,1,1-trichloroethane; carbon tetrachloride; and chlorinated fluorocarbons (Table 1).

Table 1. V-Tanks Treatment Standards specified in OU 1-10 ROD Amendment

F001 Constituent	LDR Treatment Standard for non-wastewaters 40 CFR 268.40
Trichloroethylene	6.0 mg/kg
Tetrachloroethylene	6.0 mg/kg
Methylene Chloride	30 mg/kg
1,1,1-Trichloroethane	6.0 mg/kg
Carbon Tetrachloride	6.0 mg/kg
Chlorinated Fluorocarbons	
- Trichloromonofluoromethane	30 mg/kg
- 1,1,2-Trichloro-1,2,2-Trifluoroethane	30 mg/kg

The V-Tanks waste also exhibits the characteristic of toxicity by exceeding the TCLP characteristic level (40 CFR 261.24) for trichloroethylene (D040) and tetrachloroethylene (D039). The OU 1-10 ROD Amendment already requires that these constituents be treated to meet the F001 concentration based treatment standard. The V-Tanks waste does not exceed the characteristic level for any other constituent as documented in the attached INEEL Engineering Design File-4885. No other listed code is applicable to the V-Tanks waste. This ROD imposed treatment standard to treat to the F001 treatment requirements operates in lieu of the characteristic treatment standard since this F001 treatment requirement specifically addresses the constituents that cause the waste to be characteristic i.e. trichloroethylene (D040) and tetrachloroethylene (D039). Therefore application of the specific D039 and D040 treatment standards, which would include underlying hazardous constituents (in addition to the F001 requirements), is not required. Application of the treatment standards in this manner is consistent with 40 CFR 268.9(b). Treatment of the V-Tanks waste to the F001 treatment standard produces an LDR compliant waste that can be disposed at the INEEL CERCLA Disposal Facility.

In order to support the accelerated completion of this project, your concurrence on the approach described is requested by August 18, 2004. If you have any questions or need additional information, please contact me at 208-526-4392, or Mark Shaw at 208-526-6442.

Sincerely,



Kathleen E. Hain, CERCLA Lead
Environmental Restoration Program

Enclosure

cc: C. Cody, DEQ, 1410 N. Hilton, Boise, ID 83706
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